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October 27, 2022

VIA ECF

Hon. Paul G. Gardephe
United States District Judge
United States District Court, SDNY
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2204
New York, NY 10007

Re: JTH Tax, LLC d/b/a Liberty Tax Service v. AMC Networks, et al.
No: 1:22-cv-06526-PGG, Request for Adjournment of Initial Conference

Dear Judge Gardephe:

On behalf of Plaintiff JTH Tax, LLC d/b/a Liberty Tax Service ("Plaintiff"), we write to respectfully request an adjournment of the Initial Conference scheduled for November 3, 2022 at 10:15 a.m. We request an adjournment because I will speaking at the ABA Convention in San Diego on that date and as co-lead counsel and the client relationship partner, I would prefer to attend the Initial Conference. We met and conferred with counsel for Defendants AMC Networks Inc. and Sony Pictures Television Inc. and Defendants consent to this request. Counsel for Plaintiff and Defendants are available on November 15, 16, or 18 for the Initial Conference if any of those dates works for the Court.

An adjournment of the Initial Conference is further warranted in light of the fact that Plaintiff intends to amend the Complaint in the next day or so. An adjournment of the Initial Conference will give the Defendants an opportunity to review the Amended Complaint and to determine whether to file another pre-motion letter and also allow time for Plaintiff to respond to another pre-motion letter. If the Court is not inclined to grant this adjournment request, Plaintiff is prepared to have co-lead counsel James Messenger attend the Initial Conference on November 3, 2022, along with partner Clair Wischusen.

This is the first request for an adjournment of the Initial Conference. We thank Your Honor for consideration of this request.

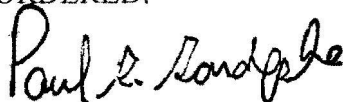
MEMO ENDORSED: The initial pre-trial conference in this case is adjourned to December 8, 2022 at 11:45 a.m. in Courtroom 705 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York.

Respectfully yours,

GORDON REES SCULLY MANSUKHANI LLP


PETER G. SIACHOS

SO ORDERED.



Paul G. Gardephe
United States District Judge
Date: October 28, 2022